



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095
(603) 271-3503 FAX (603) 271-5171



May 10, 2004

LETTER OF DEFICIENCY #WSEB 04-064
Certified Mail #7000 0600 0023 9933 8255

David Hogan
Partridge Woods Condominium Association
c/o Forest Glen Property Management
PO Box 1313
Glen, NH 03838

Subject: Bartlett - Public Water System: Partridge Woods Condominiums (EPA #0162230)

Dear Mr. Hogan:

The records of the NH Department of Environmental Services (DES) show that Partridge Woods Condominiums water system is classified as a public water system (PWS), as defined by RSA 485:1-a. A PWS is defined as any water system supplying 15 or more services, or 25 or more people for 60 or more days per year. As such, the water system owner is required to submit samples according to the system's established Master Sampling Schedule to the State laboratory or a State-certified laboratory in compliance with NH Administrative Rule Env-Ws 321 through 330.

The federal Environmental Protection Agency promulgated new radionuclide rules governing the acceptable levels of radionuclides in the Nation's community public water systems. Consequently, DES recently adopted new rules in conformance with the federal requirements. New maximum contaminant levels (MCLs) were established and additional requirements instituted for the currently regulated radionuclides. As a result of the new regulatory requirements, prompting a review of historical water quality data by senior DES staff, we determined that the following have been in violation.

SITE: BRW 1/40' WNW of Pump House

| Contaminant | MCL (units) | Historical range | Latest result (date) | Violation (yes/no) |
|-------------------------|-------------|------------------|----------------------|--------------------|
| Compliance gross alpha | 15 pCi/L | 18 - 445 pCi/L | 435 pCi/L (4/12/04) | yes |
| Uranium | 30 ug/L | 33 - 725 ug/L | 651 ug/L (4/12/04) | yes |
| Radium 226 & Radium 228 | 5 pCi/L | 0.2 - 1.6 pCi/L | 1.6 pCi/L (11/13/03) | no |

DES believes the MCL violation(s) can be corrected and future violations prevented by taking the following actions:

- 1 **By May 24, 2004**, provide public notice of the exceedence(s) following the guidelines on the enclosed public notice handout. Continue providing public notice **each calendar quarter** for as long as the exceedence occurs; and
2. Upon request, you shall make alternate (*i.e.* bottled) water available for human consumption. If bottled water is used, the source must be an approved source, monitored in accordance with Env-Ws 389;
- 3 **By June 3, 2004**, provide proof of public notice to this office following the guidelines on the enclosed public notice handout.
4. **By May 24, 2004**, retain the services of a qualified consultant to address the water quality violation(s) and notify DES, in writing, of the name of the consultant hired. The consultant should review all existing water quality data prior to making recommendations for correcting the MCL violation(s); and
- 5 **By July 12, 2004**, submit to DES the consultant's report, which shall contain the consultant's recommendations, and cost estimates, along with an implementation schedule to correct the MCL violation(s). A maintenance schedule must be included if treatment is proposed. DES must approve the consultant's report/recommendations, the maintenance schedule, and the proposed implementation schedule prior to any work being done on the system; and
6. By the DES-approved correction date, take the corrective action as approved by DES. Notify DES in writing upon completion of the action(s) taken; and
7. Continue to sample in accordance with your Master Sampling Schedule, which includes **quarterly sampling for compliance gross alpha and Uranium.**

In the event compliance is not achieved within this period, DES may take further enforcement action. These actions include issuing an order requiring the deficiencies to be corrected, initiating an administrative fine proceeding, and/or referring the matter to the NH Department of Justice for imposition of appropriate penalties.

The information as requested above should be addressed as follows or faxed to (603) 271-5171

Anne Bailey
Department of Environmental Services
Water Supply Engineering Bureau
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095

DES acknowledges that on March 23, 2004, your system received a new schedule with a letter stating that your system met the grandfathering data requirements. **Due to the elevated levels of radionuclides, as specified above, your grandfathered status for compliance gross alpha has been rescinded.** Quarterly sampling for that contaminant is required until compliance has been achieved. The sampling year for the combined Radium 226 & Radium 228 remains as 2014.

DES commends you for your proactive position in initiating a public notice to your consumers for the high Uranium values recently received by your system. Please note that the notice, as required above, must include the compliance gross alpha exceedance. The enclosed form details the requirements that must be met as well as the mandatory health effects language. It is important to also note that while a radon standard has not yet been finalized, your levels have ranged from 1300 pCi/L to 9200 pCi/L, with an average of 4,200 pCi/L. The most recent Federal MCL proposed was 4,000 pCi/L.

Further review of your system's water quality indicates that your system has also had a history of Beryllium exceedences. This was relayed to you in the Letter of Deficiency #WSEB 02-41, (LOD), issued on June 28, 2002. DES understands that this LOD is still outstanding and resolution is pending.

In addition, the Manganese levels have consistently been above the secondary maximum contaminant level (SMCL) of 0.05 mg/L. Since 1993, the average level has been 0.92 mg/L, with a range of 0.159-3 mg/L. In general this contaminant poses aesthetic concerns (e.g. taste, odor, or staining) and is not currently a health concern. Although the Manganese SMCL is enforceable, corrective action will not be required unless consumer complaints arise.

For your information, fact sheets on Mineral Radioactivity, Radon, Beryllium, and Removing Iron and Manganese from Drinking Water are available at: <http://www.des.state.nh.us/ws.htm>. These include general information, health effects and removal options. Please be reminded that proposed treatment alternatives should take into consideration all water quality parameters as well as current and future quantity needs. Bernie Lucey, P.E., may be able to answer questions concerning treatment for the aforementioned contaminant(s). He may be reached at (603) 271-2952 or via email at blucey@des.state.nh.us. If you have any questions regarding this letter, please contact Selina J. Makofsky, P.G., at (603) 271-4109 or by email at smakofsky@des.state.nh.us.

Sincerely,



Rene Pelletier, P.G., Manager
Land Resource Programs

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Partridge Woods Condominiums
May 10, 2004
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Encls: Master Sampling Schedule
Public Notice Form

cc: Gretchen R. Hamel, DES Legal Unit Administrator (w/out encl.)
Bernie Lucey, P.E., DES (via email w/out encl.)
Town of Bartlett Health Officer (w/out encl.)
Anne Chace, Forest Glen Property Management, Primary Contact
Thomas Mason, Jr., LRW Water Services, Inc., Primary Operator
Beth Debay, EPA Region I (via e-mail w/out encl.)
EPA, Region 1 (w/out encl.)
File